

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Xiafen “Sherry” Chen,  
  
Plaintiff,

v.

United States of America,  
  
Defendant.

Case No. 1:19-CV-00045

Hon. Timothy S. Black

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**JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS**

On April 22, 2022, this Court granted Plaintiff’s unopposed motion to stay the deadline to file a motion for leave to amend the complaint. (ECF No. 46.)

Thereafter, the parties have submitted periodic status reports to advise the Court regarding the parties’ settlement discussions. (ECF Nos. 47, 48, 49, 50.) Following the parties’ most recent status update, the Court ordered the parties file a joint status update by October 17, 2022.

Since the last status update, the parties made further progress in their negotiations. Counsel for Defendant received approval from the relevant agencies on a number of Plaintiff’s non-monetary requests. Today, counsel for the parties had a productive video call during which they came to an agreement on a large majority of the outstanding issues related to both the monetary and non-monetary portions of the settlement. Given that there are only a small number of items left to finalize, the parties are hopeful they can conclude the settlement process shortly.

The parties have been engaged in the settlement process and respectfully

submit an extension of the Court's stay will continue to facilitate the parties' settlement discussions and increase the likelihood that the parties are ultimately able to reach a settlement. Accordingly, they jointly request that the Court continue to stay the deadline to file a motion for leave to amend the complaint and order the parties to file another joint status report in 30 days.

Respectfully submitted,

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